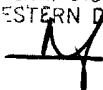


**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

AUSTIN DIVISION

FILED

APR 30 2001

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

NAEEM M. ABDURRAHMAN,

Plaintiff,

v.

**THE UNIVERSITY OF TEXAS, DALE E.
KLEIN, LARRY R. FAULKNER,
SHELDON EKLAND-OLSON, BEN G.
STREETMAN, NEAL E. ARMSTRONG,
SHELDON LANDSBERGER and
J. PARKER LAMB,**

Defendants.

Civil Action No. A-00-CA-813 JN

**PLAINTIFF ABDURRAHMAN'S DESIGNATION OF POTENTIAL WITNESSES
AND EXHIBITS**

Naeem Abdurrahman, plaintiff, designates the following as potential fact witnesses:

	Name & Address	Nature of Testimony
1	Dr. Billy V. Koen, Professor Department of Mechanical Engineering Campus Mail Code: C2200 University of Texas at Austin Austin, TX 78712 Phone: 512-471-3086 E-Mail koen@uts.cc.utexas.edu	It is anticipated that Dr. Koen will testify to the same effect as his testimony at the grievance hearing, a transcript of which is being produced for the parties.
2	Bernard W. Wehring, Adjunct Professor Department of Nuclear Engineering North Carolina State University	It is anticipated that Dr. Wehring will testify to the same effect as his testimony at the grievance hearing.

	1110 Burlington Laboratories Raleigh, NC 27695 Phone: 919-515-4599 E-Mail bwwehrin@eos.ncsu.edu	
3	Dr. Paul Nelson, Professor Department of Nuclear Engineering Texas A&M University College Station, TX 77843-3133 Phone: 979-845-4132 Email: pnelson@ne.tamu.edu	Dr. Nelson was Nuclear Group Coordinator for the ANRCP. He will testify regarding the problems with Center funding, including the withdrawal of a grant, and the insistence of Dr. Dale Klein that other research funding go through the Center.
4	Dr. Theodore A. Parish, Professor Nuclear Engineering Department Texas A&M University College Station, TX 77843-3133 Phone: (979) 845-4189 Email: tap@cedar.tamu.edu	Dr. Parish will testify regarding his collaboration with plaintiff on a number of ANRCP projects, the problems with Center funding, and Center activities in general.
5	Dr. Marvin L Adams, Assoc P rofessor Nuclear Engineering Department Texas A&M University College Station, TX 77843-3133 Phone: (979) 845-4189 Email mladams@tamu.edu	Dr. Adams will testify regarding his collaboration as co-principal investigator with the plaintiff on ANRCP projects, the problems with Center funding, the withdrawal of a grant, and the insistence of Dr. Klein that research funding be administered through the Center.
6	Musa Yavuz, PhD Address: 7201 Wood Hollow Dr. #475 Austin, TX 78731 Home Phone: (512) 345 3547 Email: Myavuz95@aol.com	Dr. Yavuz will testify to the same effect as his testimony at the grievance hearing, possibly with greater detail as to discriminatory practices of Dr. Landsberger.
7	Dr. Magdy Abdelrahman Senior Process Engineer Intel Corporation 5200 NE Elam Young Parkway Hillsboro, OR 97124-6497 Phone: (503) 613-7598 Email: magdy.s.abdelrahman@intel.com	Dr. Abdelrahman was supervised in his master's and doctoral work by Dr. Abdurrahman, and he will testify respecting harassment and discriminatory treatment by Dr. Landsberger of both himself and Dr. Abdurrahman. He will testify regarding Dr. Abdurrahman's effectiveness as a teacher and graduate advisor and about interference with his employment because of associating with Dr. Abdurrahman.

8	<p>Ms. Peggy B Berry, Manager Computer Services Department of Mechanical Engineering Campus Mail Code: C2200 University of Texas Austin, TX 78712 Phone 512-471-3020 E-Mail peggyb@mail.utexas.edu</p>	<p>As computer service manager for the Mechanical Engineering Department, Ms. Berry supervised Dr. Abdelrahman as systems administrator in the computer laboratory. She will testify regarding the interference of Drs. Landsberger and Lamb with employment of Dr. Abdelrahman in the computer laboratory.</p>
9	<p>Mohamed A. Elsayi, Engineer Structural Research and Analysis Corporation 12121 Wilshire blvd., suite 700 Los Angeles, CA 90025 Phone: 310 207 2800 ext. 754 E-mail: mohamed.elsawi@srac.com</p>	<p>Mr. Elsayi has been and is being supervised by Dr. Abdurrahman in his graduate work and will testify regarding Dr. Abdurrahman's effectiveness as a teacher and graduate advisor and regarding harassment and discrimination by Drs. Landsberger and Klein.</p>
10	<p>Dr. Young G. Jo, Senior Engineer Southern Nuclear Operating Company 40 Inverness Parkway Birmingham, AL 35242 Phone (205)982 Email: ygjo@southernco.com</p>	<p>Dr. Jo was supervised in his doctoral work by Dr. Abdurrahman and will testify regarding Dr. Abdurrahman's effectiveness as a teacher and graduate advisor and problems caused to Dr. Abdurrahman by the Mechanical Engineering Department.</p>
11	<p>Maj. Bill Spiesman, PhD Operations Officer 136th Airlift Control Flight Phone (817)852-3352</p>	<p>Major Spiesman, who already had a doctor's degree in astrophysics was supervised in master's and doctoral work in nuclear engineering by Dr. Abdurrahman and will testify he considered Dr. Abdurrahman one of the most effective faculty in the department.</p>
12	<p>Ms. Joanna Hofer Admin Associate, B.A. Department of Mechanical Engineering Campus Mail Code: C2200 University of Texas at Austin Austin, TX 78712 Phone 512-471-2832 E-Mail hofer@mail.utexas.edu</p>	<p>Ms. Hofer was the nuclear area administrative assistant for the Mechanical Engineering Department and assisted Dr. Abdurrahman with accounting of funds, student appointment and tuition and other matters. She will testify that contrary to Dr. Landsberger's contentions, Dr. Abdurrahman had problems not due to any neglect or disregard by Dr. Abdurrahman.</p>

13	<p>Julie Mercer Presently resides in California. Contact information is not presently available to Dr. Abdurrahman.</p>	<p>Ms. Mercer preceded Ms. Hofer as nuclear area administrative assistant, and assisted Dr. Abdurrahman and she will testify to the same effect as Ms. Hofer.</p>
13	<p>Ms. Sheri L Biggs, Executive Assistant Section of Neurobiology College of Natural Sciences Campus Mail Code: C0920 University of Texas at Austin Austin, TX 78712 Phone 512-232-2721 E-Mail biggs@mail.utexas.edu</p>	<p>Ms. Biggs was the administrative assistant at the Nuclear Engineering Teaching Laboratory and assisted plaintiff in some accounting and administrative needs, including student appointments and tuition. She will testify that contrary to Dr. Landsberger's contentions, Dr. Abdurrahman had problems not due to any neglect or disregard by Dr. Abdurrahman.</p>
14	<p>Dr. Abderrafi M. Ougouag Idaho National Engineering and Environmental Laboratory Engineering Research Office Building Mailstop: 3885 2525 Fremont Avenue P.O. Box 1625 Idaho Falls, ID 83415 Phone: (208)526-7659 E-Mail oom@inel.gov</p>	<p>Dr. Ougouag will testify with respect to Dr. Landsberger's discriminatory bias and practices and the effect that Dr. Landsberger had on Dr. Ougouag's being denied tenure at the University of Illinois.</p>
15	<p>Dr. Ofodike A Ezekoye, Assoc Professor Department of Mechanical Engineering Campus Mail Code: C2200 University of Texas at Austin Austin, TX 78712 Phone 512-471-3085 E-Mail dezekoye@mail.utexas.edu</p>	<p>Dr. Ezekoye applied and was granted tenure shortly before plaintiff was considered for tenure. He will testify that outside references for his application were requested from a list which Dr. Ezekoye provided.</p>
16	<p>Dr. S V Sreenivasan, Assoc Professor Department of Mechanical Engineering Campus Mail Code: C2200 University of Texas at Austin Austin, TX 78712 Phone 512-471-6546 E-Mail sv.sreeni@mail.utexas.edu</p>	<p>Dr. Sreenivasan, who was granted tenure in the Mechanical Engineering Department, the year after plaintiff was denied, will testify he was advised to stop teaching the ME 218/318 computational course to avoid having unfavorable teaching evaluations.</p>

17	Dr. Kenan Unlu, Director and Adj. Professor Ward Center for Nuclear Sciences Cornell University 105 Ward Center Ithaca, NY 14853 Phone (607) 255-5224 E-Mail ku15@cornell.edu	Dr. Unlu, project manager at the Nuclear Engineering Teaching Laboratory, will testify as to the negative effect on the laboratory working environment when Dr. Landsberger was hired, and the decision made to deny plaintiff tenure and hire Carl Beard before plaintiff actually applied for tenure.
18	Felib Iskander Austin, TX Phone: (512)255-8250 f.iskander@netzero.net	Dr. Iskander, a research scientist at the Nuclear Engineering Laboratory, will testify to the same effect as Dr. Unlu.
19	AJ Teachout Georgetown, TX E-Mail: fizzix@io.com	Dr. Teachout, health physicist at the Nuclear Engineering Teaching Laboratory will testify to the same effect as Dr. Unlu.
20	Tom Bauer Austin, TX	Dr. Bauer, assistant director and reactor supervisor at the Nuclear Engineering Teaching Laboratory, will testify to the same effect as Dr. Unlu.
21	Hatice Akkurt Ann Arbor, MI hatice@engin.umich.edu	Ms. Akkurt was supervised in her master's work by plaintiff. She will testify that she was asked and refused to write a negative letter about plaintiff and that because of the department environment she decided to pursue her doctoral work elsewhere.

POTENTIAL EXHIBITS

Plaintiff will select exhibits for trial from those offered at the grievance hearing.

EXPERT WITNESSES

At this time plaintiff does not anticipate the need to present opinion testimony.

Plaintiff timely will supplement or modify this list of witnesses and exhibits as discovery progresses and is completed.